

EPA/SERA-17 Paper on Winter Application of Manure

Office of Wastewater Management October 2, 2014







Purpose

Share with the Pacific NW CAFO workgroup the preliminary findings of the EPA/SERA-17 report:

White Paper:

Overview of Research
Findings
on
Winter Application of
Manure



Briefing Roadmap

- Purpose of White Paper
- History of EPA/SERA-17 collaboration
- Process for developing White Paper
- Drivers for winter application
- Govt controls on winter application
- Potential next steps after White Paper



Purpose of White Paper

- Facilitate an informed discussion on alternatives to winter application by describing:
 - Research on water quality impacts and risks from winter application
 - Existing federal and state restrictions on winter application



EPA/SERA-17 Exchange



- SERA-17 is formally known as the Organization to Minimize Phosphorus Losses from Agriculture (http://www.sera17.ext.vt.edu/).
- SERA-17 is made up of research scientists, policy makers (incl. USDA), extension personnel, and educators.
- EPA/SERA-17 exchange serves as a forum for sharing information on key technical and regulatory topics.
- Exchange includes staff from EPA's Office of Water.



Process for developing the paper

Fall 2011 – Spring 2013	Presentations on winter application at EPA/SERA-17 meetings Key personnel: Dr. John Lory, Caitlin Conover
Spring 2013	SERA-17 members identified core research
Summer 2013	EPA conducted literature review, drafted paper
Spring 2014	Feedback from EPA/SERA-17 workgroup
Fall 2014	Next: SERA-17 group to review draft
Fall 2014	Review by EPA management
Winter 2014	Disseminate paper—online on EPA's website, academic journal, incorporate as training material, other???

Why does winter application occur?

Common drivers cited include:

- Insufficient storage
- Time/labor management
- Avoid soil compaction
- Ensure adequate nutrient supply for spring planting



Photo: USDA/NRCS (http://www.nrcs.usda.gov/wps/portal/nrcs/detail/ia/home/?cid=STELPRDB1243043



- Reduce odor, NH3 volatilization
- Tradition
- Emergency

Photo: AgriNews (http://agrinewspubs.com/Content/Auction-Calendar/Livestock/Article/Producers-shouldremember-manure-application-rules/15/7/9108)



Federal controls on winter application—EPA



- The Clean Water Act's NPDES program and Effluent Limitations Guideline standards relevant to winter application at large permitted CAFOs are that facilities must:
 - Ensure adequate storage
 - Identify site specific conservation practices
 - Ensure appropriate agricultural utilization of manure nutrients
- State technical standards serve as basis for determining "appropriate" nutrient management
- Note: Facilities that do not apply for NPDES permit coverage must be able to demonstrate that they are adhering to appropriate nutrient management planning



Federal controls on winter application—USDA



USDA/NRCS has issued the NRCS Conservation
 Practice Standard 590 for Nutrient Management:

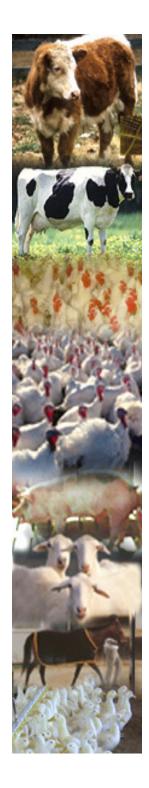
"Nutrients must not be surface-applied if nutrient losses offsite are likely. This precludes spreading on:

- frozen and/or snow-covered soils, and
- when the top 2 inches of soil are saturated from rainfall or snow melt."
- Exceptions based on certain specified conditions and adequate conservation measures
- Works indirectly as an official requirement in states that refer to it in their technical standards



Comparison of state requirements

- □ As part of white paper, EPA gathered and compared state winter application requirements (see handout)
- State requirements vary widely according to two key dimensions:
 - Level of restriction: ranges from outright ban (Indiana, Missouri) to none (Connecticut, New Jersey).
 - Program feature: e.g., authority to grant waivers, "recommended" vs. required practices, exemptions for certain circumstances.



State restrictions in Pac NW

	More stringent >>>>>>>> Less stringent					
State	Winter Application Restriction: Ban	Winter Application Restriction: Based on Form/ Method	Winter Application Restriction: Exemption/ Emergency Only	Winter Application Restriction: Based on Location	Winter Application Restriction: None	
PAC NW STATES						
Alaska	<	< 5 CAFOs			>	
Idaho			٧			
Oregon					none	
Washington					none	
OTHER EXAMPLE STATES						
Connecticut					none	
Missouri	٧					
Colorado		٧				
Montana		٧				
South Dakota		٧				
Wyoming			√			



What comes next?

- Establish the science (write the White Paper)
- Improve awareness of risks
- Explore possible solutions
- Promote solutions



Potential Actions to Improve Awareness

Need to work both with state/local entities and producers:

- State-to-State outreach
- Producer self-evaluation tools (e.g. Farmsmart)
- Outreach to specific geographic regions





Possible Equipment/Practice Solutions— "Avoid" Runoff*

- Alternative storage and processing: E.g., advanced screening, "Quickwash", pack barns
- Advanced processing: E.g., digesters w/ nutrient recovery, gasification, biochar
- Others?
- * From Avoid-Control-Trap framework



Source: NDESC, 2005



Source: http://www.energyworks.com/index.php?page=biopower



Possible Equipment/Practice Solutions: "Control" Runoff*

- Advance land appl equipment: Injection/incorporation (being investigated by USDA)
- Shared equipment?
- Others?
- Need to facilitate funding for solutions as well



Source: Pote, Dan. March 2014.

* From Avoid-Control-Trap framework



Promote basics: Nutrient management planning

- Adherence to "rate/timing/method" construct
- Is there really enough land?
- Application in excess of crop needs can lead to runoff from fields

Those discharges trigger the need for an NPDES permit!



Questions?

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